

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA	:	
	:	
vs.	:	1:21-CR-260
	:	
CRISTIAN AREVALO ARIAS,	:	
	:	
Defendant.	:	Honorable Leonie M. Brinkema
	:	

**MOTION TO EXPAND RELIEF GRANTED IN ORDER DOC. 842 TO ALL DEFENSE
TEAMS**

Mr. Arevalo hereby moves this Court to expand the relief granted in Doc. 842, which granted Mr. Arevalo's Motion for Access to Sealed Vasquez Reyes Documents and Government Motion to Seal (Doc. 820), to all defense teams. In support of this Motion, Mr. Arevalo states as follows:

1. On December 29, 2023, Mr. Arevalo filed a motion for access to certain sealed documents pertaining to deported witness Juan Vasquez Reyes.
2. On January 17, 2024, Mr. Arevalo filed a follow-up motion asking the Court to grant the same relief.
3. On January 19, 2024, this Court granted Mr. Arevalo's motion. The Court ordered the government to provide the requested documents to undersigned counsel for Mr. Arevalo.
4. Undersigned counsel is filing a renewed motion to dismiss based on the information gleaned from the requested documents. The sealed documents will be exhibits to the motion.
5. Undersigned counsel believes that all defense counsel should have access to the renewed motion to dismiss and its exhibits so that they can consider whether its contents affect

their clients and whether they might wish to join the motion. Because the motion discusses and includes currently sealed exhibits, undersigned counsel cannot share the filing without a Court order.

CONCLUSION

WHEREFORE, Mr. Arevalo requests that the Court expand the relief granted in Doc. 842 to all defense teams.

Respectfully submitted,
CRISTIAN AREVALO ARIAS

s/ Bernadette Donovan

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Counsel for Cristian Arevalo Arias

CERTIFICATE OF SERVICE

I, Bernadette Donovan, Esq., hereby certify that on this January 27, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record. A Notice of Electronic Filing will be served on:

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s/ Bernadette M. Donovan